

May 22, 2002

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U.S. EPA Region 5
AE-17J
77 West Jackson Boulevard
Chicago, IL 60604
Attn: Mr. George Czerniak

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

RE: Revised Precompliance Plan
40 CFR 63 Subpart MMM
Railworks Wood Products, Inc.
Terre Haute, Indiana
AEE 229.01

Dear Mr. Czerniak:

Last year, it came to the attention of Astbury Environmental Engineering, Inc. (AEE) that the above mentioned facility is required to comply with 40 CFR 63, Subpart MMM, National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production. Railworks Wood Products, Inc. is engaged in, among other processes, blending of oils to produce creosote for wood preservation. This document will function as the Precompliance plan for the referenced Subpart for the facility and will replace the original Precompliance plan submitted March 12, 2002.

Process Description

Creosote production at the facility is accomplished by blending of four heated hydrocarbon oils directly into a tanker truck. The hatch at the top of the tanker truck is allowed to remain open during blending to avoid excessive negative pressurization in the truck as the creosote cools. Emissions occur only by displacement of air in the truck and by movement of the heated gas to the cooler outside air (no forced air movement or air flow are present). Upon completion of the blending process, the creosote is trucked either to other locations on-site or to off-site customers.

Preliminary Emissions Testing

Upon determination of rule applicability to the facility, preliminary emission measurements were obtained by summa canister at the facility on January 29, 2002 during a production run. Results of the summa canister analysis indicated that the concentration of HAPs in the emission stream was likely to be in the parts per billion range by volume. §63.1361 states, in part:

“Process vent means a point of emission from processing equipment to the atmosphere or a control device.[...] A vent is not considered to be a process vent for a given emission episode if the undiluted and uncontrolled emission stream that is released through the vent contains less than 20 ppmv HAP, as determined through process knowledge that no HAP are present in the emission stream; using an engineering assessment as discussed in §63.1365(b)(2) [sic] (ii); from test data collected using Method 1818 [sic] of 40 CFR part 60, appendix A; or from test data collected using any other test method that has been validated according to the procedures in Method 301 of appendix A of this part.”

From the preliminary emission data, it appeared that the tanker truck would be likely to fall outside the definition of a process vent by producing less than 20 ppmv of HAPs. Because no other PAI process vents exist at the facility, it would then be exempt from the requirements of 40 CFR 63, Subpart MMM. However, also by the definition, it was necessary to verify the summa canister results through an engineering assessment, testing by Method 18 of 40 CFR 60 Appendix A, or by testing via an alternative approved method.

It was thought that the low expected HAP concentration in the emission stream would present some difficulties with traditional application of Method 18. Method 18 requires concurrent use of an unspiked sampling train with a sampling train spiked at 40-60% of the expected HAP concentrations. AEE was advised by an accredited testing laboratory that it would not be technically feasible to spike in the parts per billion range, as would be required based on preliminary results. In addition, three replicate samples would be required at a duration of at least one hour each. The batch creosote manufacturing process is typically completed in approximately 45 minutes, meaning that testing during different manufacturing events, possibly under different ambient conditions, would be required to obtain the three samples. A relatively high flow rate would also be required over the 45-minute period to obtain an adequate sample. Based on this information, AEE received approval to employ an alternative test method from U.S. EPA (dated March 28, 2002) allowing testing by 40 CFR 60 Appendix A, Method 25A. This testing was performed on May 3, 2002.

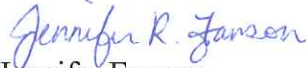
By this method, it was determined that VOCs as TOC were present in the high ppm range, as opposed to the ppb range indicated by initial testing. It must be concluded that the initial test equipment malfunctioned or that other unforeseen circumstances led to the initial low readings.

Precompliance Plan Considerations

Based on this new information, Railworks will comply with Subpart MMM by June 30, 2002, the compliance date. The expected method of compliance is employment of a VOC-control device such as an activated carbon canister. AEE is currently working with control-device providers to design the control device, which will be installed and operational by the compliance date of the Subpart.

Thank you for your assistance in this matter. Should you have any questions or concerns, please feel free to contact this office at your convenience.

Sincerely,
ASTBURY ENVIRONMENTAL ENGINEERING



Jennifer Fanson
Project Manager



Willis M. Overton, CHMM
Vice President, Industrial Services

JRF/WMO:jrf
Enclosures

Cc: Mr. Sam Sutopo, Railworks Wood Products